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UNITED STATES DISTRICT COURT

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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Kevin Turner and Shawn Wooden, on behalf  
of themselves and others similarly situated,

Plaintiffs,

v.

National Football League and NFL Properties  
LLC, successor-in-interest to NFL Properties,  
Inc.,

Defendants.

Case No. 2:12-cv-00092-AB

No. 12-md-2323 (AB)

MDL No. 2323

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**NOTICE OF JOINDER**

Comes Now, Attorney Simona Farrise and the Farrise Law Firm, P.C., and their clients Vernest Alexander, Abdul-Karim Al-Jabbar, Aaron Bailey, Mario Bailey, John Bellamy, Wilson Bryant, Hilliary Butler, Byron Chamberlain, Jessie Chatman, Shannon Clavelle, Kirby Dar Dar, Dale Dawkins, Joe Fishback, Dion Foxx, Willie Gault, Dwayne Goodrich, Alvin C. Harper, Corey Harris, Eric Johnson, Brian Jones, Lamont Jordan, Todd Kelly, Clarence Love, Derek Loville, Terry Mickens, David Richie, John Rogers, Sammie Rogers, Irving Spikes, Travis Stephens, Lemuel Stinson, and Barron Tanner (collectively “Farrise Clients”) in the above named and numbered cause of action, and hereby notify this Court and all parties that said firm, counsel and Farrise clients do hereby join and/or adopt as applicable to Farrise Clients the portions of the Neurocognitive Football Lawyers, PLLC’s and The Yerrid Law Firm’s September 14, 2017 Objection and Motion for Relief, document 8375, that asserts 1) the claims administrator BrownGreer has improperly amended the requirements of the Amended Settlement Agreement by adding requirements for otherwise eligible retired players demanding that they submit

“documentary evidence” which existed prior to the date of pre-BAP Qualifying diagnosis when the plain language of the Amended Settlement Agreement does not require such submissions; and 2) that on the basis of the Claims Administrators improper administration of the Amended Settlement Agreement, eligible retired players have improperly received claim deficiency notices.

Farrise clients further join and adopt as applicable to them the Motion to Determine Proper Administration of Claims Under the Settlement Agreement and Incorporated Memorandums of Law and supporting exhibits, document 8267 filed August 15, 2017 by Loren & Kean Law, that objects to the improper claims administration practices which amended the court’s Amended Settlement Agreement and requests relief as to the improper claims practices and a tolling of the time in which improper deficiencies are to be cured for Farrise clients.

Filed this 18th day of September, 2017 in the United States District Court for the Eastern District of Pennsylvania, MDL 2323.

Respectfully Submitted,

**/S/SIMONA FARRISE**  
**SIMONA FARRISE, ESQUIRE COUNSEL**  
**FOR CLAIMANTS/PLAINTIFFS**  
**California Bar NUMBER 171708**  
**Farrise Law Firm**  
**2150 Allston Way, #260**  
**Berkeley, CA 94704**  
**TELEPHONE: 310-424-3355**  
**FACSIMILE: 510-588-4536**

**CERTIFICATE OF SERVICE**

I CERTIFY that the above has been filed with the Clerk of Court's EF/ECM system, which will provide service to all parties designated to receive service this September 18, 2017.

**/S/SIMONA FARRISE**  
**SIMONA FARRISE, ESQUIRE COUNSEL**  
**FOR CLAIMANTS/PLAINTIFFS**  
**California Bar NUMBER 171708**  
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